

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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SALVADOR ARELLANES JIMENEZ and
GENARO CISNEROS, *individually and on
behalf of others similarly situated,*

Plaintiffs,

-against-

G&J'S PIZZERIA LLC (D/B/A G&J'S
PIZZERIA) and GREGORIO VARIOS,

Defendants.

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Docket No.: 20-cv-05454 (JPC)

**DECLARATION OF
WILLIAM K. OATES IN
SUPPORT OF PLAINTIFFS'
MOTION FOR LEAVE TO
AMEND THE CAPTION AND
DEFAULT JUDGMENT**

I, WILLIAM K. OATES, declares under penalty of perjury, pursuant to 28 U.S.C. §1746,
that:

1. I represent Plaintiffs Salvador Arellanes Jimenez and Genaro Cisneros
("Plaintiffs") in this wage and hour action. I submit this declaration in support of Plaintiffs' motion
for leave to amend the caption and default judgment.

2. Attached as Exhibit "A" is Plaintiffs' proposed amended caption.

3. The reason for the underlying application is to correct the name of the Individual
Defendant. The Individual Defendant, currently named as Gregorio Varios, is actually named
Gregory Barrios, and the proposed amendment would reflect this correction. Plaintiffs are not
proposing any other amendments.

4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: New York, New York
May 16, 2022

CSM LEGAL, P.C.

By: /s/William K. Oates
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